

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CHRISTOPHER JOHNSON,

Plaintiff,

v.

XCALIBUR LOGISTICS,

Defendant.

§
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C.A. No. 4:19-CV-02996

(JURY TRIAL DEMANDED)

PLAINTIFF'S MOTION TO COMPEL
DEFENDANT'S DISCOVERY RESPONSES AND REQUEST FOR ORAL HEARING

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CHRISTOPHER JOHNSON,	§	
	§	
Plaintiff,	§	
	§	
VS	§	C.A. No. 4:19-CV-02966
	§	
XCALIBUR LOGISTICS	§	
	§	
Defendant.	§	(JURY TRIAL DEMANDED)

ORAL DEPOSITION OF JEFFREY LYNN MARONEN

March 25, 2021

(REPORTED REMOTELY)

Volume 1 of 1

Oral Deposition of JEFFREY LYNN MARONEN, produced as a witness at the instance of MS. KATRINA PATRICK, ATTORNEY FOR PLAINTIFF, and duly sworn, was taken in the above-styled and numbered cause, on March 25, 2021, from 9:53 a.m. to 12:40 p.m., before Lydia P. Battle, Certified Shorthand Reporter, RPR, in and for the State of Texas, reported by stenographic means, at 26434 Morgan Creek Lane, Katy, Fort Bend County, Texas, pursuant to the Federal Rules of Civil Procedure, the Current Emergency Order Regarding the COVID-19 State of Disaster, and the provisions stated on the record attached hereto.

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COURT REPORTER: Today's date is March 25th, 2021. The time is approximately 9:53 a.m. This is the Oral Deposition of Jeffrey Lynn Maronen, and it is being conducted remotely in accordance with the Current Emergency Order Regarding the COVID-19 State of Disaster, paragraphs 2.b. and c. The witness is located at 26434 Morgan Creek Lane, Katy, Fort Bend County, Texas. The witness has been identified to me through their Texas Drivers license.

This deposition is being taken in case styled Christopher Johnson Vs. Xcalibur Logistics, Civil Action 4:19-CV-02966, in the United States District Court for the Southern District of Texas, Houston Division.

My name is Lydia Battle with Coastal Reporting Service, and my CSR number is 2264. I'm administering the oath and reporting the deposition remotely by stenographic means from my residence in Harris County, Texas.

At this time, would counsel please state their appearances and locations for the record and also state the appearance of anyone else in the room with you who is also attending and stipulate to allow me to swear in the witness. We will begin with the taking attorney.

MS. PATRICK: All right. Good morning again. My name is Katrina Patrick. I am taking this deposition remotely from my home office and there's no one else in my home office.

A P P E A R A N C E S

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ALSO PRESENT: Mr. Christopher Johnson

MR. WASHINGTON: Mickey Washington, co-counsel with Katrina Patrick. I am in my office and I'm alone.

MS. ZINECKER: Katie Zinecker for Defendant Xcalibur Logistics. I am also in my home office, in Pearland, Texas, and there's no one else in the room with me.

COURT REPORTER: Would counsel like to state any particular stipulations at this time?

MS. PATRICK: The only thing I would put on the record is that this deposition is being taken pursuant to the Federal Rules and that the parties have a running agreement that we will make objections to form, and that's all I can recall at this time. How about you, Ms. Zinecker?

MS. ZINECKER: Nope, that's it. We agree to those stipulations.

MS. PATRICK: All right.

COURT REPORTER: Would you like the witness to read and sign, Ms. Zinecker?

MS. ZINECKER: Yes, please.
(Witness sworn by court reporter.)

COURT REPORTER: Counsel may proceed.

JEFFREY LYNN MARONEN,
having been first duly sworn, testified as follows: